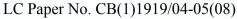
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THE HONG KONG GENERAL INSURANCE AGENTS ASSOCIATION LTD

23 June 2005

By Fax

Attention: Miss May Leung.

July 4, Legco Panel on Financial Affairs

Dear Miss Leung

## Re: Position paper on the subject of Proposed Modifications to the IIQAS for Sale of Travel Insurance by Travel Agent

We refer to the captioned subject and having consulted with our members we are pleased to advise that we object the above proposal with the following grounds.

- We welcome the travel agents to sell travel insurance provided that they are qualified and registered through the same IIQAS channel. However we object to allow travel agents a separate paper to acquire such qualification. The reason is that the IIQAS has been successfully implemented for years and has raised the professional standard and image of the insurance industry and such incomplete exam papers would downgrade the image, professional conduct and quality of our insurance intermediaries.
- 2. We have no objection to encourage travellers to buy travel insurance while they would travel abroad especially after the tsunami disaster in South Asia last December and in fact there are many channels for them to find travel insurance In Hong Kong travel agents have long been offering travel insurance over their counters when someone approach them and they have already included an item of insurance premium in their tour fee invoice. Travellers will get insurance cover so easily if they are willing to pay the invoiced premium unless they refuse. Therefore, we are of the opinion that the above Proposed Modifications is not the right remedy to encourage travelers to buy travel insurance.
- We are afraid that if the travel agent sector is allowed to be qualified via a lower standard exam paper then other sectors of the community will follow suit and will cause unnecessary chaos.

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4. Moreover, we do not agree that the proposed "travel insurance agents" are allowed to be exempted from CPD requirement since this arrangement is the minimum and mandatory requirement for all insurance agents to sell insurance or give advice on insurance matters. To create such a different class of intermediaries would be most unfair to those who have to comply with the requirement. And in order to maintain a professional image and to enhance the competence for the insurance intermediaries, therefore travel insurance agents should not be allowed such privilege.

Thank you for your kind attention to this matter.

Yours sincerely,

Chairman

c.c. The Honorable Bernard Chan